

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

APR - 3 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY 51
DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOB ELIEZER DE LA TORRE,

Defendant.

SA-25-cr-00200-FB

INFORMATION

COUNT 1: 18 U.S.C. § 933(a)(3)
Conspiracy to Traffic Firearms

COUNT 2: 18 U.S.C. § 922(a)(1)(A)
Dealing in Firearms Without a License

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
[18 U.S.C. § 933(a)(3)]

From on or about June 6, 2023, through on or about September 16, 2023, in the Western District of Texas, Defendant,

JOB ELIEZER DE LA TORRE,

did knowingly and intentionally conspire to ship, transport, transfer, cause to be transported, and otherwise dispose of any firearm, to wit, an automatic FightLite belt-fed rifle bearing an Orchid Defense Group lower receiver, to another person in and affecting interstate or foreign commerce, knowing and having reasonable cause to believe that the possession of the firearm by the recipient would constitute a felony, to wit, Possession of a Machinegun, in violation of Title 18, United States Code, Section 922(o), and all in violation of Title 18, United States Code, Section 933(a)(3).

COUNT TWO
[18 U.S.C. § 922(a)(1)(A)]

From on or about January 1, 2020, to on or about November 2, 2023, in the Western District

of Texas, Defendant,

JOB ELIEZER DE LA TORRE,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Firearm Violation and Forfeiture Statutes

[Title 18 U.S.C. § 933(a)(3), subject to forfeiture pursuant to Title 18 U.S.C. § 934(a)(1)(A) and (B)]

As a result of the criminal violation set forth in Count One, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

Title 18 U.S.C. § 934. Forfeiture and Fines.

(a) Forfeiture. --

(1) In general. -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

II.

Firearm Violation and Forfeiture Statutes

[Title 18 U.S.C. § 922(a)(1)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violation set forth in Count Two, the United States gives notice to the Defendant of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 18 U.S.C. § 924. Penalties

(d)(I) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties described below:

1. Glock GMBH 48 Pistol CAL: 9 SN: BLGX009;
2. Privately Made Firearm (PMF) Unknown Receiver/Frame CAL: Unknown SN: None;
3. Palmetto State Armory Tyranny-15 Pistol CAL: Unknown SN: TJEFFERSON1635;
4. Aero Precision Texas Pistol CAL: Unknown SN: TX5857;
5. Larue Tactical LT-15 Pistol CAL: Unknown SN: TX5857;
6. Anderson Manufacturing AM-15 Pistol CAL: Unknown SN: 23022550;
7. Palmetto State Armory Maga-15 Pistol CAL: Unknown SN: BIGLY01795;
8. Runner Runner Guns R-15F Rifle CAL: Unknown SN: TX0129;
9. TS Arms TS-15 Rifle CAL: 556 SN: SP3-0085;
10. MKE-Makina VE Kimya Endustrisi Kurumu (Kirikkale) AP5 Pistol CAL: 9 SN: T0624-20CF00911;
11. Runner Runner Guns R-15F Rifle CAL: Unknown SN: TX0128;
12. Israel Weapon IND- IWI (Israel Military IND- IMI) Galil Ace SAR Pistol CAL: 762 SN: G2003796;
13. STI (Strayer Tripp Intl, STI Intl, Staccato) 2011 Pistol CAL: 9 SN: P2110702;
14. STI (Strayer Tripp Intl, STI Intl, Staccato) 2011 Pistol CAL: 9 SN: P2127808;
15. Arex Rex Zero 1T Pistol CAL: 9 SN: A22913;
16. CZ (Ceska Zbrojovka) CZ75 SP-01 Pistol CAL: 9 SN: A989005;
17. Sig-Sauer P226 Elite Pistol CAL: 9 SN: 47E019389;
18. Israel Weapon IND- IWI (Israel Military IND- IMI) Jericho 941 Pistol CAL: 9 SN: J1006912;
19. STI (Strayer Tripp Intl, STI Intl, Staccato) 2011 Pistol CAL: 9 SN: XC224193;
20. Privately Made Firearm (PMF) Unknown Receiver/Frame CAL: Unknown SN: None;
21. CZ (Ceska Zbrojovka) CZ75 SP-01 Pistol CAL: 9 SN: D113581;
22. Sig-Sauer P226 Elite Pistol CAL: 9 SN: UU650031;
23. Springfield Armory, Geneseo, IL Prodigy Pistol CAL: 9 SN: NMH26408;
24. STI (Strayer Tripp Intl, STI Intl, Staccato) 2011 Pistol CAL: 45 SN: TG20459;
25. STI (Strayer Tripp Intl, STI Intl, Staccato) 2011 Pistol CAL: 9 SN: TX02407;
26. Glock GMBH 43X Pistol CAL: 9 SN: BNUW928;
27. Sig-Sauer P226 Pistol CAL: 9 SN: 47A081665;
28. Sig-Sauer P226 Elite Pistol CAL: 9 SN: U696381;
29. CZ (Ceska Zbrojovka) CZ452 ZKM Scout Rifle CAL: 22 SN: B046080;
30. Aero Precision X15 Pistol CAL: Unknown SN: X400451;
31. Palmetto State Armory HBR-15 Pistol CAL: Unknown SN: 8700492;
32. Palmetto State Armory ISRAEL-15 Pistol CAL: Unknown SN: 194800084;
33. TS Arms SP3 Receiver/Frame CAL: 556 SN: SP3-0084;
34. Double Star Corp. Star 15 Receiver/Frame CAL: 556 SN: D0004666;
35. Palmetto State Armory CONFIRMED-15 Pistol CAL: Unknown SN: SCOTUS0645;

36. Palmetto State Armory SPACERIDER-15 Pistol CAL:Unknown SN:HANGON04298;
37. Palmetto State Armory SNEK-15 RECEIVER/FRAME CAL:Multi SN:YC9-00390;
38. Palmetto State Armory Baby PFG-15 Pistol CAL:Unknown SN:POOPY00432;
39. Palmetto State Armory Baby PFG-15 Pistol CAL:Unknown SN:POOPY00291;
40. Palmetto State Armory MAGA-15 Pistol CAL:Unknown SN:BIGLY01794;
41. Privately Made Firearm (PMF) Unknown Receiver/Frame CAL: Unknown SN: None;
42. Privately Made Firearm (PMF) Unknown Receiver/Frame CAL: Unknown SN: None;
43. Privately Made Firearm (PMF) Unknown Receiver/Frame CAL: Unknown SN: None;
44. Privately Made Firearm (PMF) Unknown Receiver/Frame CAL: Unknown SN: None;
45. \$26,000, more or less, in United States currency; and
46. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

III.

Money Judgment

Money Judgment: A sum of money equal to **\$196,850** that represents the proceeds obtained by the Defendant as a result of the firearm violations for which the Defendant is liable.

Substitute Assets

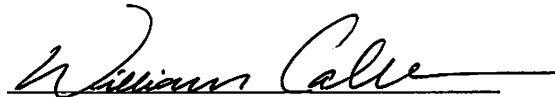
If any of the above described forfeitable property, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States of America to seek forfeiture of any other property owned by the Defendant, up to the value of said money judgment, as substitute assets pursuant to Title 21 U.S.C. 853(p) and Fed. R. Crim. P. 32.2(e)(1).

MARGARET F. LEACHMAN
ACTING UNITED STATES ATTORNEY

BY:

A handwritten signature in black ink, appearing to read "William F. Calve", is written over a horizontal line.

WILLIAM F. CALVE
Assistant United States Attorney